

To <Catherine.P.Awakuni@hawaii.gov>

cc <sgolden@hawaiigas.com>, <JTantlin@dbedt.hawaii.gov>, <rezachekd001@hawaii.rr.com>, <darcy.endo@heco.com>, <Kal.Kobayashi@co.maui.hi.us>, <icfm@verizon.net>,

bcc

Subject RE: Transmission of responses to EI's second concept paper

Hi Cat,

Sorry for both the informal and late reply. I appreciate you passing along the others' comments in anticipation of receipt of KIUC's.

As I had mentioned to you on the phone, and as I pointed out during the first workshop, my primary concerns pertain to analyses associated with ACT 95 being able to accurately differentiate between a non-profit, member owned electric cooperative (KIUC) and an investor owned utility (HEI).

Some thoughts specific to the comment sections:

Par. 106:

In general, when reviewing mainland RPS rules and procudures for applicability in Hawaii, we need to be sure to accurately identify how these policies/procedures may, and more importantly, may not, apply to an electrically isolated island utility. We also need to keep in mind that these comparisons may be impacted by the relatively smaller size of some the utilities in Hawaii.

Par 121:

Only comment is that I'm sure that there will be interesting discussions regarding the role of demand side (energy efficiency, chp, etc) vs supply side options, especially given that there is an active Energy Efficiency Docket.

Par 172:

IR (Incentive Mechanisms) imply do good and be rewarded, do poor and pay the price. My question is, who exactly is rewarded and who pays? As I mentioned above, the analyses need to be able to differentiate between rewarding/penalizing customers/owners (KIUC) vs. customers/shareholders (HECO).

Thank you again for accepting my late reply.

See you Monday.

Joe McCawley Mgr. Regulatory Affairs 808-246-8205